

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC.,  
PELVIC REPAIR SYSTEMS  
PRODUCTS LIABILITY LITIGATION

MDL NO. 2327

---

THIS DOCUMENT RELATES TO THE CIVIL ACTION NOS. LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT  
AMERICAN MEDICAL SYSTEMS, INC. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant American Medical Systems, Inc. (“AMS”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third party claims. Accordingly, Plaintiffs and AMS jointly move the court to dismiss AMS as a defendant in these actions with prejudice, and terminate AMS from the docket in the actions, parties to bear their own costs. Other defendants remain in these actions, and plaintiffs will continue to pursue these actions against them.

Respectfully:

/s/ Barbara Binis  
Barbara Binis  
REED SMITH  
Three Logan Square, Suite 3100  
1717 Arch Street  
Philadelphia, PA 19103  
215.851.8100 (phone)  
215.851.1420 (fax)  
bbinis@reedsSmith.com

/s/ Erik W. Legg  
Erik W. Legg (WVSB 7738)  
FARRELL, WHITE & LEGG PLLC  
P.O. Box 6457  
Huntington, WV 25772-6457  
304.522.9100 (phone)  
304.522.9162 (fax)  
ewl@farrell3.com

*Attorneys for Defendant American Medical Systems, Inc.*

/s/ Clayton A. Clark  
Clayton A. Clark  
CLARK LOVE & HUTSON  
Suite 1600  
440 Louisiana Street  
Houston, TX 77002  
713.757.1400 (phone)  
713.759.1217 (fax)  
cclark@triallawfirm.com  
*Attorney for Plaintiffs on Exhibit A*

Dated: February 3, 2017

**EXHIBIT A – CLARK, LOVE & HUTSON**

<b>CIVIL ACTION NUMBER</b> (listed numerically in ascending order)	<b>CASE NAME</b>
2:12-CV-03806	Margarita Baltierrez v. Johnson & Johnson, Inc., Ethicon, Inc. and American Medical Systems, Inc., Johnson & Johnson
2:12-CV-07626	Clara Melancon, Robert Melancon v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:12-CV-09209	Dedra Craig v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-01131	Connie S. Wilson, Mark H. Wilson v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-01138	Leocadia Lopez, Daniel Lopez v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-02627	Shannon J. Dora, Robert A. Dora Jr. v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-06646	Mary Beth Hash, Harold D. Hash v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-06674	Betty J. Massengale v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-07788	Kathleen A. Alsbury, David L. Alsbury v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-07794	Imelda T. Munoz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-08580	Phyllis J. Bacon, Kenneth R. Bacon v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-08586	Denia E. Cruz, Ramon Cruz v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-10197	Viola D. Cantu, Adam Cantu v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.
2:14-CV-10215	Janet L. Wisdom v. Ethicon, Inc., Johnson & Johnson, American Medical Systems, Inc.

**CERTIFICATE OF SERVICE**

I hereby certify that on February 3, 2017 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases.

/s/Barbara R. Binis